

REMARKS

The November 3, 2004 Office Action has been received and its contents carefully considered. Claims 1-10 and 12-16 are pending in the present application. By this Amendment, claim 6 is amended and claim 11 is canceled without prejudice or disclaimer to the subject matter set forth therein. For the reasons set forth below, the claims are believed to be in condition for allowance.

Applicant respectfully requests clarification of the rejection. The Office Action rejects claims 1-16 under 35 U.S.C. §102 based on the teachings of Brandt. However, it appears from page 5 of the Office Action, the teachings of a Crawford reference are being applied, i.e., as to claims 8-10. Accordingly, it is submitted that the basis of such rejection is fully unclear. The Examiner is requested to clarify the manner in which the Crawford reference is being applied against the pending claims.

I. THE CLAIMS DEFINE PATENTABLE SUBJECT MATTER

The Office Action rejects claims 1-16 under 35 U.S.C. § 102(e) as being anticipated by Brant et al. (U.S. Patent No. 6,714,979). This rejection is respectfully traversed. The Examiner is respectfully requested to reconsider the asserted rejection based on the remarks set forth below.

Claim 1 of the present application recites a method for converting a plurality of data files and associated information from a first file format to a second file format comprising the steps of: extracting at least one data file from at least one first format file server, wherein the at least one data file includes a first format image portion and a first format work information portion;

converting the first format image portion of the at least one data file to a second format image portion; converting the first format work information portion of the at least one data file to a second format work information image portion; creating a second format data file including both the second format image portion and the second format work information image portion; and importing the second format data file into a second format file server. Applicant respectfully submits that Brandt fails to teach or suggest such features.

The Office Action asserts that as to claims 1, 6 and 12, Brandt discloses a system with means, method and computer program product, for converting a plurality of data files and associated information from a first file format to a second file format [e.g. see Fig(s). 2-6; Abstract], comprising (as set forth in the Office Action):

a) a legacy file server for storing a plurality of legacy data files in a first file format [e.g., the Legacy platforms 80(a)-(d), col. 9, line 50 - col. 10, line 16];

b) a file extraction program for retrieving the legacy data files as well as associated indexing and work history information from the legacy file server [e.g., the Information Advantage® software running on the Decision Support Server 475, Fig. 7 and associated texts];

c) the file extraction program further operating to convert the legacy data files and related information into data files meeting a current selected format [col. 15, lines 7-39];

d) a conversion verification program for ensuring that the conversion made by the file extraction program is completed without errors [e.g., the NRL(382), the ARDA (383) and the FTP (378) verification processing, Fig. 14(b); Col. 33, line 25 - col. 34, line 34];

e) a file importing program for importing the newly converted files into a current format file server [e.g., col. 7, lines 20-24].

The above Office Action's interpretation of Brandt, and that Brandt teaches the claimed invention, is respectfully traversed.

Brandt is directed to a data warehousing infrastructure for a web based reporting tool. In the Abstract, Brandt teaches that a data warehousing infrastructure for telecommunications priced call detail data is integrated with a Web/Internet based reporting system providing a common GUI enabling the requesting, customizing, scheduling and viewing of various types of priced call detail data reports. Such an infrastructure performs an extraction process to obtain only those billing detail records of entitled customers, and a harvesting process for transforming the billing records into a star schema format for storage in one or more operational data storage devices.

In column 14, lines 14-22, Brandt teaches the Brandt invention relates to a data warehousing infrastructure for the StarODS Priced call detail data reporting component of the nMCI Interact system 200. Brandt describes that the diagram of FIG. 7 illustrates, at a very high level, the systems involved in modifying and delivering BDRs to the StarODS priced call detail data reporting system, and in requesting, creating and delivering reports to the customer based upon those records.

The Office Action references column 15, lines 7-39. Specifically, the Office Action asserts that Brandt teaches a file extraction program further operating to convert the legacy data files and related information into data files meeting a current selected format [col. 15, lines 7-39].

Brandt teaches that, as shown in Fig. 7, the data warehousing infrastructure 400 may include a Decision Support Server 475 executing a combination of logic programs such as C++ and Information Advantage.RTM. software for use as the reporting engine. In column 15, Brandt further teaches that this component reads metadata, translates into queries, runs queries against harvested data fact tables in data marts, formats query results into a format readable by Message Center viewers, transmits complete reports to directory on Inbox server, and, additionally, performs cost estimation, scheduling, transaction logging and generates report metrics; and, 8) Talarian Smart Sockets interface between the decision support server and the StarWRS report requester reporting system comprising messaging middleware used to coordinate report requests transmitted from StarWRS to DSS.

In column 15, lines 21-39, Brandt also teaches that, as shown in the FIG. 7, other external systems and applications may interface with the common data gateway component 430 including: Cyclone Billing system 422a and Concert Virtual Network Services 422b which provide additional billing detail records; and, a calling area database 425 which provides geographical reference information, i.e., identify city, state and country information. Brandt describes that as additionally shown in FIG. 7 is the StarWRS web based reporting system 200 including: Report Manager for storing report definitions, metadata; Report requestor for providing the interface used by the customer to enter report criteria, and submit report metadata to Decision Support Server; and, StarWRS Inbox or Message Center for holding completed reports, providing an interface notifying customer that reports are available, and supplying metadata to a Report Viewer component so that user can view a report.

However, such teachings of Brandt fail to teach or suggest the claimed invention. The

features of claim 1 relate to both extracting and converting data. Specifically, claim 1 recites: *extracting* at least one data file from at least one first format file server, wherein the at least one data file includes a first format image portion and a first format work information portion; *converting* the first format image portion of the at least one data file to a second format image portion; *converting* the first format work information portion of the at least one data file to a second format work information image portion; *creating* a second format data file including both the second format image portion and the second format work information image portion.

Accordingly, as can be appreciated, the claimed invention sets forth a specific manipulation of data relating to both extracting and converting data. Brandt clearly teaches aspects of data extraction. However, it is respectfully submitted that Brandt fails to teach or suggest the claimed features relating to data conversion, so as to teach the claimed invention.

Applicant acknowledges that Brandt teaches aspects of conversation. Specifically, Brandt teaches, in column 42 with reference to Fig. 16, that as indicated at step 832, the DSS receives the request and acknowledges receipt. Specifically, when the request is received it is first validated with StarOE to ensure that the user is entitled to receive information about the selected product corp and number(s). Once the request passes validation, the DSS LAIO reads the header to determine which Data Mart will ultimately be queried. It then parses the metadata into a format which the COTS software can readily convert into a SQL statement, as indicated at step 835, FIG. 16(b), and adds the report to the DSS report queue based upon type (Daily, Weekly, Monthly, Adhoc) and associated DataMart, as indicated at step 638. At this point, the request has been flagged as submitted in the RM database, as indicated at step 633.

Brandt further teaches (column 42, lines 44-65) that, as shown in FIG. 15(b), a Formatter

module 395 may perform various report result transformations including: 1) Converting of column headers generated by Information Advantages into appropriate column ids that are recognizable to the StarWRS client viewer functionality (as indicated at step 850, FIG. 16(b)); 2) Provide subtotalling for specific requested "subtotal by" columns in the format required by the StarWRS client interface (as indicated at step 853, (FIG. 16(b)) and provides report-based totals as requested by customer; 3) converting binary stream data file to ASCII text file (as indicated at step 855, FIG. 16(c)); 4) implementing Replace logic, e.g., replacement of "TAB" delimiters with appropriate "Comma" field delimiters (as indicated at step 857 FIG. 16(c)); 5) implementing Repeat/Padding logic, i.e., identifying compressed columns/values and decompressing (or repeating) the values that were compressed; 6) providing alphanumeric translations for any encoded data elements returned in the result set data file (as indicated at step 859, FIG. 16(c)); and, 7) adding new computed/derived columns, e.g., percents, averages of column data values, etc., as requested by customers on specific reports.

However, the above disclosures do not teach or suggest the particulars of claim 1. Claim 1, as well as the other independent claims, do not generally recite conversion. Rather, claim 1 recites a specific methodology involving both extraction and conversion, and a specific manipulation of data. It is respectfully submitted that Brandt fails to teach or suggest such specifics.

Relatedly, the Office Action asserts on page 5, that Brandt teaches creating a second format data file including both the second format image portion and the second format work information image portion [e.g., col. 2, lines 16-40; col. 3, lines 49-59; Fig. 10 and associated texts]. It is respectfully submitted that Brandt simply does not teach such features.

That is, Brandt in column 2, lines 31-40, teaches CDRs are sent to the billing system which applied billing based on call detail values. These "priced" CDRs are known as Billing Detail Records ("BDRs") and are sent to a Perspective Host("Phost") server 25. The Phost server 25 filters out the BDRs not pertaining to the "Perspective" customers, applies various transformations to the customer's raw call detail data to generate summary data, and generates and formats the data for the various Perspective customers. Further, in column 3, lines 49-59, Brandt teaches the nMCI Interact Reporting system and data warehousing infrastructure is a layer functioning to enable customers to request reporting functionality across the Web/Internet. Brandt describes that this report request functionality includes routing requests to appropriate data marts, e.g., real-time reporting requests may be satisfied by real-time database. Additionally, the interface provides customers with the ability to schedule and prioritize reports, format report request result sets, and provides for load balancing, report request validation, query generation and execution. Through a common GUI, customers are enabled to access their own billing call detail data.

Accordingly, it is not seen that Brandt supports the teachings as asserted on page 5, lines 1-3, of the Office Action. Further, it is submitted that the sum of Brandt's disclosure fails to teach or suggest the invention as recited in claim 1.

For at least the above reasons, it is respectfully submitted that claim 1 defines patentable subject matter. Further, independent claims 6 and 11 define patentable subject matter at least for reasons similar to those set forth above with respect to claim 1. Further, the various dependent claims are allowable at least based on their dependencies on the independent claims, as well as for the additional features set forth therein.

II. CONCLUSION

Applicant respectfully submits that the application, as amended, is in condition for allowance. If the Examiner believes that prosecution might be advanced by discussing the application with Applicants' counsel, in person or over the telephone, we would welcome the opportunity to do so.

In the event any fees are due, the Commissioner is hereby authorized to charge the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS

By: 

James R. Miner
Registration No. 40,444

Hunton & Williams LLP
1751 Pinnacle Drive
Suite 1700
McLean, VA 22102
Telephone (703) 714-7400
Facsimile (703) 714-7410

Dated: March 3, 2005